

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

PRETRIAL DISCLOSURES

COMES NOW the plaintiff, Belinda Jones, by counsel, and provides her Pretrial Disclosures pursuant to Rule 26(a) (3) (A) of the Federal Rules of Civil Procedure.

(i). The following persons are expected to be called by Plaintiff as witnesses at trial:

1. Belinda Jones;
2. Debra Davidson;
3. State Trooper Steven Krantz;
4. Brandon K. Cox, M.D. and,
5. Jaclyn Royal (may call if the need arises).

(ii). The Plaintiff designates the following witnesses whose testimony the Plaintiff may present by deposition:

1. Jaclyn Royal;
2. State Trooper Steven Krantz;
3. Brandon K. Cox, M.D.

(iii). The following is a list of documents, photographs or other exhibits the Plaintiff expects to offer:

1. Photographs of the scene of the collision, all as produced in discovery, including those photographs identified as exhibits to discovery depositions and photos taken by Debra Davidson;
2. Photos of the vehicles involved in the collision, all as produced in discovery, including those photographs identified as exhibits to discovery depositions;

3. Photographs of the Plaintiff's injuries taken at various times, all as produced in discovery;
4. Medical Bills of the Plaintiff's treating medical providers, including a Summary of those medical bills totaling \$15,328.81, including a list and summary of prescription medications, as produced in discovery;
5. Opinion letter by Brandon K. Cox, M.D. dated May 11, 2016.

(iv). The following is a list of documents or other exhibits the Plaintiff may offer if the need arises:

1. Medical Records of the Plaintiff's treating medical providers for treatment of injuries related to the collision, as produced in discovery;
2. Plaintiff's Past Medical records for treatment of the Plaintiff prior to the collision.

Respectfully submitted,

/s/ Richard F. Popp

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Counsel for the Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on June 9, 2017, I caused the foregoing Belinda Jones' Pretrial Disclosures to be filed with the Clerk of Court using the CM/ECF system, which will provide electronic notice to the following:

Joseph W.H. Mott, Esquire
Assistant United States Attorney
P.O. Box 1709
Roanoke, VA 24008

/s/ Richard F. Popp
Richard F. Popp
Counsel for Plaintiff